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ATTORNEYS

JUSTIN M. REILLY, ESQ.  
KEITH E. WILLIAMS, ESQ.

**Via: EDNY ECF**

Honorable Judge Sarah L. Cave  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl St., CR 18A  
New York, NY 10007

The Court is in receipt of Plaintiff's letter-motion seeking a ten-day extension of his deadline to file a motion for default judgment ("MDJ") for the attention of the Honorable Jeannette A. Vargas. (ECF No. 64 (the "Letter-Motion")). The Letter-Motion is GRANTED, and Plaintiff shall file the MDJ by **Friday, March 28, 2025**.

The Clerk of Court is respectfully directed to close ECF No. 64.

SO ORDERED. 3/18/2025

  
SARAH L. CAVE  
United States Magistrate Judge

**Re: *Liriano v. Ovadia; 23-cv-02829 (PGG)(SLC)***

Dear Hon. Judge Cave,

I represent Plaintiff in this FLSA action. Kindly accept this correspondence as Plaintiff's request for a brief, ten-day extension of the time to file a motion for default judgment.

On February 24, 2025, Your Honor issued an Order to Initiate Default Proceedings as a result of Defendants failure to obtain new counsel or otherwise defend against Plaintiff's allegations. To that end, Your Honor directed Plaintiff to request a Certificate of Default from the Clerk by March 4, 2025 and to file a Motion for Default Judgment by March 18, 2025. D.E. 47. Plaintiff filed said request with the Clerk on March 4, 2025, D.E. 51-54, and corrected requests on March 6, 2025, D.E. 55-58. The Clerk issued Certificates of Default against each Defendant on March 10, 2025. D.E. 60-62.

The instant request for an extension is necessary because I have had numerous depositions and mediations over the past two weeks that have prevented me from completing Plaintiff's Motion for Default Judgment. These prior engagements could not be rescheduled. As such, Plaintiff respectfully requests that the date to submit his Motion for Default Judgment be extended from March 18, 2025 up to and including March 28, 2025. This is Plaintiff's first request for an extension and no other deadlines will be affected by granting the request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

  
Keith E. Williams, Esq.